

SOUTH SAN JOAQUIN IRRIGATION DISTRICT
P. O. Box 747
Ripon, CA 95366-0747

December 27, 2007

Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, California 95670-6114

Dear Board Members:

RE: Comments on Irrigated Lands Program Monitoring & Reporting Program, Order No. R5-2008-____
for Coalition Groups Under Amended Order No. R5-2006-0053 Coalition Group Conditional
Waiver Of Waste Discharge Requirements for Discharges from Irrigated Lands Revision 26
November 2007.

South San Joaquin Irrigation District appreciates the opportunity to comment on the Tentative
Monitoring & Reporting Program for Coalition Groups.

Our comments are directed at the presentation of information: The addition of nutrients into the
program, the assessment monitoring time table are two points of concern as well as the definition of
Receiving Waters, and referencing the 303d listed water bodies.

Our first point is on Page 6 the first full paragraph mentions; "Monitoring site information shall include
a description of the study area, GPA coordinates, crops and land use in the watershed, and the
pesticides, chemicals, and nutrients being applied."

There is no rational way to track nutrients being used in a watershed; natural manures, fertilizers, etc...
are not reported to any organization from which this information can be obtained. The rational to obtain
this information is not practical; the staff time for the Coalition to try to obtain any portion of this
information would be better spent on other requirements of the proposed Monitoring & Reporting
Program (MRP).

The second point relates to Page 9; Table II.A, Assessment Monitoring Schedule. Specifically
Frequency, Monthly monitoring year round will be excessive. Some Irrigated Lands are only irrigated
for three to four months out of the year while some Irrigation Districts may be able to supply water for
irrigation eight months out of twelve. In the off months there is no water available, thus no runoff, until
the rains come at which time the Coalition Groups would proceed with Storm Water monitoring events.
Each Coalition knows when there is irrigation water available for their watersheds and should be given
the opportunity to schedule monthly monitoring during those months of the year. In order to have an
effective program there must be some flexibility and rational behind the monitoring strategy.

For Storm Water Monitoring there is a definite probability that a false positive will occur during a first
flush Storm Water event. This event is a cleansing sweep of water that picks up everything that has
accumulated from industrial air particles, urban influence, and any number of other sources not related
to agriculture. This program should be designed to represent Agricultural Drainage and as such the First
Flush Rain Event should not be included in this program.

On page 10 it states "If monthly sampling does not, or is not expected to represent at least two storm
events per year, then the Coalition Group shall identify and implement a logistically feasible approach in
the MRP Plan to attempt to capture at least two storm events annually per site."

This is not a reasonable request for many watersheds in the Coalition areas. As mentioned before, the "First Flush Storm Event" not a realistic representation of natural Agricultural drainage in any watershed. The lower San Joaquin Valley may only have one storm water event that meets the parameters (definition) of a true "Storm Water Event". In this situation there would not be a second Storm Water Monitoring Event to meet the requirements of the proposed MRP.

Our third point concerns the constituents on page 14;

Molybdenum (total) has no standard for Agricultural use? It would be irresponsible to use this element as an indicator for Nutrients or Fertilizers because it is not used in all fertilizers but it is found in several ground water basins. Is there a good reason to include this in the MRP?

Is there a Standard for TOC, Selenium (total), or copper? Are these reported for reference only, no exceedences?

Splitting out three; Nitrate plus Nitrite as Nitrogen, Total Ammonia, and Unionized Ammonia (as a calculated value), are completely different than "Total N". Why is this extra expense necessary?

We would also note that pH and DO should not be subject to exceedences, they should be reported for reference only.

Our fourth point concerns Tentative Attachment B, Definitions;

"73. Receiving Waters – Surface waters that receive or have the potential to receive discharges from irrigated lands." This program should reflect true Agricultural Drainage. Monitoring should be restricted to those waters that do receive Agricultural Drainage. Not include any waters that might have the potential to receive agricultural drainage. This definition does not reflect the MRP for Ag Discharges from Irrigated Lands.

"95. Waters of the State – As defined in Water Code Section 13050. Any surface water or groundwater, including saline waters, within the boundaries of the State." We object to the inclusion of groundwater into this program.

The last point is in reference to the use of any reference to any 303D listed water bodies in this MRP. The original Ag Waiver, Discharges from Irrigated Lands Program, did not reference the 303d listed water bodies and this is a continuation of the original Ag Waiver. Adding any 303d listed water bodies to this program is unethical.

If you have any questions or concerns regarding this document, please contact me at (209)-993-7971 or e-mail at jima@ssjid.com.

Sincerely,



Jim Atherstone
Environmental Compliance & Safety Officer
South San Joaquin Irrigation District